

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS**

DAMONIE EARL, LINDA RUGG, ALESA BECK, TIMOTHY BLAKEY, JR., STEPHANIE BLAKEY, MARISA THOMPSON, MUHAMMAD MUDDASIR KHAN, ELIZABETH COOPER, JOHN ROGERS, VALERIE MORTZ-ROGERS, and LAKESHA GOGGINS, each individually and on behalf of all others similarly situated,

Plaintiffs,

v.

THE BOEING COMPANY and
SOUTHWEST AIRLINES CO.,

Defendants.

Civil Action No. 4:19-cv-00507

RESPONSE TO DEFENDANTS' MOTION TO SHOW AUTHORITY TO ACT

Defendants have "move[d] the Court to require Messrs. Hecht and Lorin to demonstrate that they have authority to act on behalf of Pierce Bainbridge or Plaintiffs in this matter." Dkt. 127 at 2. The motion should be denied as moot.

On June 11, 2020, Hecht Partners LLP ("HP") submitted a Sur-Reply To Bathaee Dunne's Motion To Designate Interim Lead in which HP set forth that it was appearing "as successor to Pierce Bainbridge Beck Price & Hecht LLP ("PB") in connection with this action, and as counsel to plaintiffs Stephanie Blakey, Timothy Blakey Jr., Lakesha Goggins, Damonie Earl, Alesa Beck, Marisa Thompson, John Rogers, [and] Valerie Mortz-Rogers" Dkt. 136 at 1. On June 19, 2020, HP produced to all counsel its engagement agreements with the foregoing plaintiffs ("Plaintiffs"). Accordingly, HP and Messrs. Hecht and Lorin have demonstrated their authority to act on behalf of Plaintiffs.

In addition, on June 10, 2020, PB filed the Declaration of Camille Varlack in Support of PB's Supplemental Response to Andrew Williamson's Ex Parte Submission, dated June 8, 2020, in which Ms. Varlack, the Chief Operating Officer ("COO") of PB, declared that Messrs. Hecht and Lorin remain at PB. Dkt. 134 at Pars. 4-6. For the avoidance of any doubt, John Pierce, PB's Managing Partner, has submitted herewith an additional declaration confirming that Messrs. Hecht and Lorin remain of counsel at, and are authorized to act on behalf of, PB in connection with this matter. *See* Declaration of John M. Pierce. Accordingly, Messrs. Hecht and Lorin have demonstrated that they have authority to act on behalf of PB and its clients in this matter.

In light of the foregoing, the motion should be denied as moot.

Dated June 22, 2020

/s/ Andrew J. Lorin
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record through the Court's EM/ECF electronic filing system on June 22, 2020.

/s/ Andrew J. Lorin
Andrew J. Lorin